

informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "relates to" as overbroad and unduly burdensome.

OFCCP further objects to the phrase "summaries" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 18:

ALL DOCUMENTS RELATED to COMMUNICATIONS between YOU and any THIRD PARTIES, including possible CLASS MEMBERS or their attorneys, that RELATE to the allegations described in Paragraph 7 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "communications" as overbroad and unduly burdensome.

OFCCP'S OBJECTIONS AND ANSWERS TO DEFENDANT ORACLE AMERICA, INC.'S REQUEST FOR
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OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.
OFCCP further objects to the entirety of this request as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 19:

All statistical studies and analyses RELATED to the allegations described in Paragraph 7 of the Amended Complaint, including any that YOU did not adopt or endorse, and any that resulted in calculations different from those presented in Paragraph 7. This request seeks all responsive DOCUMENTS in both final and draft form.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP further objects to the phrases "adopt" and "endorse" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 20:

All DOCUMENTS RELATED to the claim in Paragraph 8 of the Amended Complaint that "Oracle discriminated against qualified African American employees in Product Development roles" at HQCA.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS RELATED to YOUR determination of which employees are "qualified," as alleged in Paragraph 8 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology used to make such a determination.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP'S OBJECTIONS AND ANSWERS TO DEFENDANT ORACLE AMERICA, INC.'S REQUEST FOR PRODUCTION, SET ONE
(OALJ CASE NO. 2017-OFC-00006)

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodology" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 22:

All DOCUMENTS RELATED to YOUR determination of which employees are "comparable Whites," as alleged in Paragraph 8 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology used to make such a determination.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodology" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 23:

All DOCUMENTS RELATED to YOUR determination of which "roles" are "similar," as alleged in Paragraph 8 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology used to make such a determination.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodology" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 24:

All DOCUMENTS RELATED to YOUR "controlling for job title, full-time status, exempt status, global career level, job specialty, estimated prior work experience, and company

tenure,” as alleged in Paragraph 8 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology YOU used.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government’s deliberative process privilege, the governmental privilege for investigative files and techniques, the government’s informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP’s internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase “related to” as overbroad and unduly burdensome.

OFCCP objects to the phrase “methodology” as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP’s investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 25:

All DOCUMENTS RELATED to the allegation in Paragraph 8 of the Amended Complaint that a standard deviation of -2.10 exists. This request includes but is not limited to final and draft DOCUMENTS showing underlying statistical data, methodologies, models and actual computations used to determine the standard deviation, as well as DOCUMENTS showing calculations and/or methodologies different from what is alleged in Paragraph 8.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government’s deliberative process

privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodologies" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 26:

All DOCUMENTS that identify the African Americans that YOU allege are victims of the alleged discrimination described in Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "identify" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 27:

All DOCUMENTS that identify the "comparable Whites employed in similar jobs" that YOU used as comparators in reaching the conclusions alleged in Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "identify" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 28:

All DOCUMENTS RELATED to the comparisons YOU made between any "African Americans" and any "comparable Whites employed in similar roles" as alleged in Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 29:

All CASE FILES RELATED to the allegations of Paragraph 8 of the Amended

Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 30:

All CASE ANALYSES RELATED to the allegations of Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 31:

All interview notes, summaries and memoranda for each interview YOU conducted that RELATES to the allegations of Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's

informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "relates to" as overbroad and unduly burdensome.

OFCCP further objects to the phrase "summaries" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 32:

ALL DOCUMENTS RELATED to COMMUNICATIONS between YOU and any THIRD PARTIES, including possible CLASS MEMBERS or their attorneys, that RELATE to the allegations described in Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "communications" as overbroad and unduly burdensome.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP'S OBJECTIONS AND ANSWERS TO DEFENDANT ORACLE AMERICA, INC.'S REQUEST FOR
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OFCCP further objects to the entirety of this request as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 33:

All statistical studies and analyses RELATED to the allegations described in Paragraph 8 of the Amended Complaint, including any that YOU did not adopt or endorse, and any that resulted in calculations different from those alleged. This request seeks all responsive DOCUMENTS in both final and draft form.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP further objects to the phrases "adopt" and "endorse" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 34:

All DOCUMENTS RELATED to the claim in Paragraph 9 of the Amended Complaint that "Oracle discriminated against qualified Asian employees in Product Development roles" at HQCA.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 35:

All DOCUMENTS RELATED to YOUR determination of which employees are "qualified," as alleged in Paragraph 9 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology used to make such a determination.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodology" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 36:

All DOCUMENTS RELATED to YOUR determination of which employees are "comparable Whites," as alleged in Paragraph 9 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology used to make such a determination.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodology" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 37:

All DOCUMENTS RELATED to YOUR determination of which "roles" are "similar," as alleged in Paragraph 9 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology used to make such a determination.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodology" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 38:

All DOCUMENTS RELATED to YOUR "controlling for job title, full-time status, exempt status, global career level, job specialty, estimated prior work experience, and company

tenure,” as alleged in Paragraph 9 of the Amended Complaint, including but not limited to DOCUMENTS RELATED to the methodology YOU used.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government’s deliberative process privilege, the governmental privilege for investigative files and techniques, the government’s informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP’s internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase “related to” as overbroad and unduly burdensome.

OFCCP objects to the phrase “methodology” as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP’s investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 39:

All DOCUMENTS RELATED to the allegation in Paragraph 9 of the Amended Complaint that a standard deviation of -6.99 exists. This request includes, but is not limited to final and draft DOCUMENTS showing underlying statistical data, methodologies, models and actual computations used to determine the standard deviation, as well as DOCUMENTS showing calculations and/or methodologies different from what is represented in Paragraph 9.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government’s deliberative process

OFCCP’S OBJECTIONS AND ANSWERS TO DEFENDANT ORACLE AMERICA, INC.’S REQUEST FOR PRODUCTION, SET ONE
(OALJ CASE NO. 2017-OFC-00006)

privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP objects to the phrase "methodologies" as vague and ambiguous and overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 40:

All DOCUMENTS that identify the Asians that YOU allege are victims of the alleged discrimination described in Paragraph 8 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "identify" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 41:

All DOCUMENTS that identify the "comparable Whites employed in similar jobs" that YOU used as comparators in reaching the conclusions found in paragraph 9 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "identify" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 42:

All DOCUMENTS RELATED to the comparisons YOU made between any "Asians" and any "comparable Whites employed in similar roles" as described in Paragraph 9 of the Amended Complaint.

RESPONSE:

OFCCP'S OBJECTIONS AND ANSWERS TO DEFENDANT ORACLE AMERICA, INC.'S REQUEST FOR PRODUCTION, SET ONE
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OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 43:

All CASE FILES RELATED to the allegations described in Paragraph 9 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 44:

All CASE ANALYSES RELATED to the allegations described in Paragraph 9 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 45:

All interview notes, summaries and memoranda for each interview YOU conducted that RELATE to the allegations described in Paragraph 9 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's

informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "relate to" as overbroad and unduly burdensome.

OFCCP further objects to the phrase "summaries" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 46:

ALL DOCUMENTS RELATED to COMMUNICATIONS between YOU and any THIRD PARTIES, including possible CLASS MEMBERS or their attorneys, that RELATE to the allegations described in Paragraph 9 of the Amended Complaint.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "communications" as overbroad and unduly burdensome.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP further objects to the entirety of this request as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 47:

All statistical studies and analyses RELATED to the allegations described in Paragraph 9 of the Amended Complaint, including any that YOU did not adopt or endorse and any that resulted in calculations different from those alleged. This request seeks all responsive DOCUMENTS in both final and draft form.

RESPONSE:

OFCCP objects to this Request to the extent it seeks information protected by the attorney-client privilege, attorney work-product doctrine, the government's deliberative process privilege, the governmental privilege for investigative files and techniques, the government's informant privilege, the trial preparation privilege described in Rule 26(b)(3) of the Federal Rules of Civil Procedure, or exemption provided by the Rules of Practice, Federal Rules of Civil Procedure or Evidence, or the common law.

OFCCP further objects on relevance grounds. Materials reflecting OFCCP's internal deliberations and processes in its investigation are not relevant because they will not show, one way or the other, whether Oracle violated its equal opportunity obligations, including through engaging in systemic compensation and hiring discrimination.

OFCCP additionally objects to this Request to the extent it seeks documents that were created after March 11, 2016, which was the date the Notice of Violation was issued, because any such documents were created in anticipation of litigation and are protected by the work product doctrine, trial preparation privilege, and/or attorney-client privilege.

OFCCP further objects to the phrase "related to" as overbroad and unduly burdensome.

OFCCP further objects to the phrases "adopt" and "endorse" as vague and ambiguous.

Subject to and without waiving the foregoing objections, OFCCP will produce all non-privileged documents contained in OFCCP's investigative file for Oracle Redwood Shores (OFCCP Case No.: R00192699).

REQUEST FOR PRODUCTION NO. 48: